

Robert D. MacGill
317.961.5085
Robert.MacGill@MacGillLaw.com

Via Email
December 18, 2023

John R. Jacobson
Katharine R. Klein
Riley & Jacobson, PLC
1906 West End Avenue
Nashville, TN 37203

Steven G. Mintz
Terence W. McCormick
Mintz & Gold LLP
600 Third Avenue, 25th Fl.
New York, New York 10016

RE: *Hunt v. Southern Baptist Convention et al.*, 3:23-cv-243 (M.D. Tenn.)

Dear Counsel:

We write on behalf of Plaintiff Johnny Hunt with respect to the dispute over depositions as discussed at the December 14, 2023, meet and confer.

At the meet and confer, Guidepost insisted only two depositions should be scheduled now—Russell Holske Jr. and Samantha Kilpatrick (Guidepost’s lead investigators). Then, the remainder of Plaintiff’s noticed depositions should be scheduled only after the conclusion of these two depositions. Plaintiff cannot agree to postponing the scheduling of the Tongring, Wood, and Collura depositions. Guidepost’s own discovery responses and document productions confirm the importance of each noticed deposition:

- Samantha Kilpatrick, Russell Holske, Krista Tongring, and Julie Myers Wood were all identified in Guidepost’s interrogatory responses as “individual[s] involved in drafting portions of the Report that involve Johnny Hunt.” Moreover, both Ms. Wood and Tongring “*reviewed and edited [the] portion of the Report related to Plaintiff.*” (emphasis added).¹

¹ Guidepost’s July 17, 2023 Responses and Objections to Plaintiff’s First Set of Interrogatories.

December 18, 2023

Page 2

- The same individuals were also identified in Guidepost's interrogatory responses as being "involved in the decision to include Complainant's allegations against Johnny Hunt in the Report." In this response, Guidepost also identified Anthony Collura.²

Given Guidepost's consistent pattern of delay, Plaintiff needs all of the requested depositions scheduled by December 22, 2023. We look forward to discussing this in greater detail at the meet and confer scheduled for December 19, 2023. We are hopeful we can agree to a schedule this week. If not, we will promptly pursue next steps with the Court.

Best regards,

Very truly yours,



Robert D. MacGill

² *Id.*